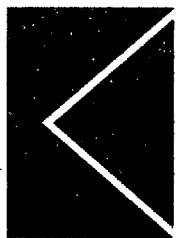


**KESSLER  
CHEMICAL**



ISO 9001 REGISTERED

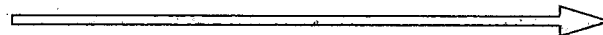


SDMS DocID

2199440

**OVER 35 YEARS  
OF  
DEDICATED  
SERVICE**

ORIGINAL



77 West Broad Street, Unit 21A • Bethlehem, Pennsylvania 18018, USA • (610) 758-9602 • Fax: (610) 758-9615  
..... Email: [InquireHere@kesslerchemical.com](mailto:InquireHere@kesslerchemical.com) • Web: [www.kesslerchemical.com](http://www.kesslerchemical.com) .....

June 1, 2012

Kenneth I. Rose, III, Financial Analyst  
Office of Enforcement, Cost Recovery Branch  
U.S. Environmental Protection Agency, (Region III)  
1650 Arch Street (3HS62)  
Philadelphia, PA 19103

Enclosure E Response to EPA letter dated March 15, 2012

I have reviewed all existing files to determine if Kessler Chemical, Inc. (KCI) shipped hazardous substances, including those specifically mentioned by name in Enclosure E of your letter to the Metro Container (METRO) site. KCI did not produce such substances and did not have such facilities to do so. We were not able to locate a copy of our April, 1988 response letter, which EPA states we sent and was received by EPA. It is my understanding you were also not able to locate a copy.

With this as background, I provide the following responses to your March 15, 2012 letter:

1. I have located documents from 1987-88 (see enclosed) that suggest that approximately 600 KCI empty drums were at the METRO site for reconditioning. No METRO bills of lading, pickup receipts, purchase orders, invoices etc. were found.

a) KCI owned no such facilities. An address of the facility from which the empty drum shipments might have been made is EZ Chemical Co., Laurel and Canal Streets, Philadelphia, PA. EZ Chemical was a toll packager for KCI of chemicals that were produced elsewhere. EZ Chemical is no longer in business.

b) No products/materials were produced for KCI at EZ Chemical. Chemicals, produced by independent contractors, were filled by EZ into drums from delivering tank trucks.

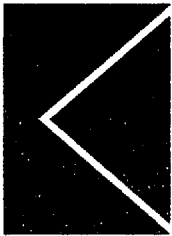
2. Not applicable. See 1b.

3. Not applicable. See 1b.

4. None. See 1a and 1b.

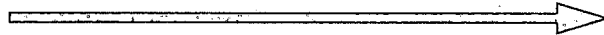
5. Not applicable

**KESSLER  
CHEMICAL**



ISO 9001 REGISTERED

**OVER 35 YEARS  
OF  
DEDICATED  
SERVICE**



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..... Email: [InquireHere@kesslerchemical.com](mailto:InquireHere@kesslerchemical.com) • Web: [www.kesslerchemical.com](http://www.kesslerchemical.com) .....

6. Aniline

7. None

8. No drums would have been sent from any KCI facilities, as we had no such facilities. Any empty drums, formerly-containing Aniline, that were sent to METRO for reconditioning would have had product/hazmat labels, customer labels and EMPTY DRUM labels on them, as well as been green and white in color.

9. Only empty drums were shipped to METRO.

10. Aniline

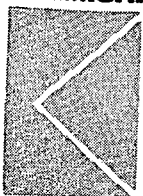
11. Mr. Barry M. Kessler, President, Kessler Chemical, Inc., 77 West Broad Street, Unit 21A, Bethlehem, PA 18018, 610-758-9602.

12. KCI has not located any such documents, and did not have a retention policy during the stated time period.

13. KCI has no such information.

  
Barry M. Kessler

**KESSLER  
CHEMICAL**



KESSLER CHEMICAL, INC. □ BOX 270, STREET ROAD □ NEW HOPE, PENNSYLVANIA 18938 □ (215) 598-7141

1/13/88

TO: Ed Zaborocki, Jr.  
EZ Chemical

Confirming our recent telephone conversations, I will sell you my inventory of "raw", DOT17C drums, formerly in aniline service. Most of these drums (about 70%) are lined with (2) coats of Unichrome baked phenolic. All these drums, which number about 600, are at metro, with the exception of the 65 recently returned to your facility by Pfizer. I am asking \$4 per drum on an "as is, where is" basis. Let me know if you're interested.

Please find enclosed copies of sections of the DOT Regs relative to the packaging of allyl alcohol. You should note that if you plan to use the DOT17C drums referred to above for this product, they should be reconditioned only by a certified reconditioner.

Regards,  
Barry Kessler

2537

DATE 1/30/87



TO:

**SHIP TO:** for packaging at  
**EZ Chemical**  
**Laurel & Canal Sts.**  
**Philadelphia, PA**

DATE REQUIRED	SHIP VIA	F.O.B.	PAYMENT TERMS
2/3/87 9am	(see below)		Net 30
QUANTITY AND PACKAGING	DESCRIPTION OF MATERIAL	PRICE	AMOUNT
Drum off approximately 100 X 450# net drums of Aniline, Lot# 870203 as follows:		\$7.00/Dr. plus dunnage charge	
80 drums into green & white reconditioned DOT 17C drums from Metro. Fill in on drum labels: Code# 00040 Lot# 870203 P.O.# CA 21476 Del# 3			
Also apply a Returnable Aniline Drum label to the head of these drums.			
Balance of load into new, lined, gray & white DOT 17C drums from our inventory.			
	Take retain samples Apply Cap seals Send paperwork ASAP		
	Metro did not deliver 200 drums - 2-2-87 due to a fire		

Delivering Bulk Carrier: Carbon Express (1-800-341-2302)  
Outbound Drum Carrier: 80 drums PRMMI/McCullough (1-800-631-2022)  
Source of empty drums: Metro (approx. 200 drums arriving 2/2)  
Full drum disposition: 80 Beacon drums to be palletized, stretch-wrapped and put into 35 foot PRMMI Container on 2/5. B/L enclosed. Certificate of analysis & MSDS to be taped to drum at rear. Brace & Block load.

BY Barry M. Kessler

KESSLER CHEMICAL DRUMMED INVENTORY AT E3

Storage Records

MT Reconditioned Metro  
drums (~~2~~) Green &  
white

Date In 2-13-87

Lot Number \_\_\_\_\_

Product \_\_\_\_\_

Net wt. \_\_\_\_\_

Quantity In 110 (full)

(partial) \_\_\_\_\_

Date Out \_\_\_\_\_

Shipped To \_\_\_\_\_

Quantity Out \_\_\_\_\_

Amount Left 110

870324 (47 g. 102)

47 = 63

870324 (63)

63 = 0

6th Kessler

Ochoa - March

KESSLER CHEMICAL DRUMMED INVENTORY AT

E2 (870217)

Recons ~~from inventory~~  
Gow-metro  
in stock

Tues

Storage Records

Date In 2-24-87

Lot Number 870224

Product Aniline

Net wt. \_\_\_\_\_

Quantity In 102

Quantity drummed (full) \_\_\_\_\_

(partial) \_\_\_\_\_

Date Out

Shipped To

Quantity Out

Amount Left

3-3-87

Ochoa

72 =

30 recons

3/18/87

Ochoa (Billed 870226)

9 =

21 drs.

recons - 102

see  
Calab-Frost  
recognition report

received - 45,900\*

45,740\*

etch - 608-10925 d- 3-24-15528.73

ben Exp- 3913 d- 3-16 1010.93

Rmm1- 360-0589241-d-4-3 1793.52

tero- 1584- d- 3-13 825.00

pass- 6831- d- 4-3-87- 150.00

- 6816 d- 3-24-87 - 714

- 1031787- d- 3-19 129

R(Cardena) - 592-d- 3-31 416

Ochoa - 8353-d- 4-3-87 - 17,658.00

Ochoa net, 9 drums (8368) 2,155.68

NO. 370217

DATE 2/19/87

KESSLER CHEMICAL, INC. □ 270 STREET ROAD, R.D. #2 □ NEW HOPE, PENNSYLVANIA 18938, U.S.A. □ 215-598-7141

TO: EZ Chemical Co.  
ATTN: Ed Makrocki  
3230 North Third St.  
Philadelphia, PA 19140

SHIP TO:

EZChemical Co.  
Laurel & Canal Streets  
Philadelphia, PA

CB 32756

# PURCHASE ORDER

[illegible]

**SPECIAL INSTRUCTIONS:**

Delivering carrier: Carbon Express

Full drum disposition: Hold in stock for March shipment to Puerto Rico

BY: BaPry M. Kessler

DATE 2/13/87

TO:

SHIP TO:

EZ Chemical Co.  
ATTN: Ed Zakrocki  
3230 North Third St.  
Philadelphia, PA 19140

EZ Chemical Co.  
Laurel & Canal Sts.  
Philadelphia, PA

QB-32757

[illegible]

**SPECIAL INSTRUCTIONS:**

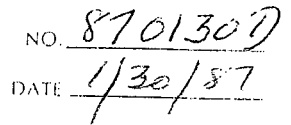
Delivering carrier: Cabbon Express

Full drum disposition: Hold in stock for March Shipment to Puerto Rico

BY Barry M. Kessler

SEE TERMS AND CONDITIONS ON REVERSE SIDE





Er

SHIP TO:

DATE REQUIRED	SHIP VIA	F.O.B.	PAYMENT TERMS
2/6/87 4PM	See below		Net 30
QUANTITY AND PACKAGING	DESCRIPTION OF MATERIAL	PRICE	AMOUNT
	Drum off approx. 100 X 450 # net dis. of Aniline, Lot 870206 into new lined, gray + white DOT 17C drums from our stock. Fill in on drum labels for 60 of these drums? Lot 870206, P.O. G-2676V. Also apply a Returnable Aniline Drum label to the head of these drums.		
	Take return samples Apply cap seals and paperwork ASAP		

### **SPECIAL INSTRUCTIONS:**

Special Instructions: Delivery Bulk Camera Carbon Express (1-800-341-2302)

Full drum disposition: the 60 drums labeled PD G-2676 will be picked up 2/10 by Pfizer. They will be bring empty and we dra. for Metro Pick up a few days later. Balance of this lot left stock.

BY